

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEIRDRE YOUNG,

Plaintiff,

v.

Case No.: 1:23-cv-00445

WASHINGTON GAS LIGHT COMPANY,

and

TEMPORARY SOLUTIONS, INC.

Defendants.

DEFENDANT TEMPORARY SOLUTION INC.'S MOTION TO DISMISS

COMES NOW, Defendant Temporary Solutions, Inc. (“Temporary Solutions”), by and through its undersigned counsel, and hereby respectfully submits this Motion to Dismiss for failure to state claims upon which relief may be granted in response to Plaintiff Deirdre Young’s (“Young” or “Plaintiff”) Complaint.

1. Young has failed to allege any facts in this action that would plausibly establish claims under either Virginia Human Rights Act (“VHRA”) or 42 U.S.C. 1981. *See Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009).

2. In sum, Plaintiff has failed to exhaust her administrative remedies as required to bring her alleged claims of discrimination, harassment, and retaliation under the VHRA, and has wholly failed to allege any facts that would be sufficient to support her claims of race-based discrimination, harassment, or retaliation against Temporary Solutions under Section 1981.

3. In support of this motion, Temporary Solutions submits an accompanying Brief in Support. For the reasons outlined above, and included in the accompanying brief, Temporary

Solutions respectfully requests that the Court grant Temporary Solution's Motion to Dismiss each of Young's claims, and dismiss Young's Complaint as against Temporary Solutions.

Respectfully submitted this 11th day of April, 2023.

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By: /s/ Justin F. Ferraro

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*Attorneys for Defendant Temporary Solutions,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2023, I filed the foregoing Temporary Solutions, Inc.'s Motion to Dismiss using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

Dated: April 11, 2023

By: /s/ Justin F. Ferraro

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